

Exhibit 1

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

TALESHA WRIGHT,

Plaintiff,

vs.

MIDLAND CREDIT MANAGEMENT, INC.,

Defendant.

CIVIL DIVISION

ELECTRONICALLY FILED

Case No. AR-21-005363

COMPLAINT IN CIVIL ACTION

Filed on Behalf of Plaintiff:
Talesha Wright

Counsel of Record for this Party:
J.P. WARD & ASSOCIATES, LLC

Joshua P. Ward
Pa. I.D. No. 320347

J.P. Ward & Associates, LLC
The Rubicon Building
201 South Highland Avenue
Suite 201
Pittsburgh, PA 15206

Telephone: (412) 545-3015
Fax No.: (412) 540-3399
E-mail: jward@jpward.com

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

TALESHA WRIGHT,

CIVIL DIVISION

Plaintiff,

ELECTRONICALLY FILED

vs.

Case No. AR-21-005363

MIDLAND CREDIT MANAGEMENT, INC.,

Defendant.

COMPLAINT

AND NOW, comes Plaintiff, Talesha Wright, by and through the undersigned counsel, J.P. Ward & Associates, LLC and, specifically, Joshua P. Ward, Esquire, who files the within Complaint in Civil Action against Defendant, Midland Credit Management, Inc., of which the following is a statement:

PARTIES

1. Plaintiff, Talesha Wright (hereinafter "Talesha Wright"), is an adult individual who currently resides at 600 Greenleaf Drive, Monroeville, Pennsylvania 15146.

2. Defendant, Midland Credit Management, Inc., (hereinafter "Midland Credit Management"), is a corporation with its principal place of business located at 350 Camino De La Reina, San Diego, California 92108.

JURISDICTION AND VENUE

3. Jurisdiction is proper as Plaintiff brings this lawsuit under the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (hereinafter, the "FDCPA").

4. Venue is proper pursuant to Pa.R.C.P. 2179(a)(2) because Defendant regularly conducts business in Allegheny County, Pennsylvania, and because Defendant is subject to general jurisdiction of Allegheny County, Pennsylvania.

PROCEDURAL HISTORY AND FACTUAL ALLEGATIONS

5. On December 14, 2020, Midland Credit Management, filed a Civil Complaint against Talesha Wright in Magisterial District Court at Docket Number: MJ-05207-CV-0000309-2020. A true and correct copy of the Docket is attached hereto, made a part hereof, and marked as Exhibit "A".

6. In response to the aforesaid lawsuit, Talesha Wright engaged The Law Firm of Fenters Ward for representation.

7. On December 30, 2020, The Law Firm of Fenters Ward served Midland Credit Management with a letter, (hereinafter, the "First Dispute Letter") wherein Midland Credit Management was informed of the disputed nature regarding the alleged debt and that Talesha Wright was represented by counsel. A true and correct copy of the First Dispute Letter is attached hereto, made a part hereof, and marked as Exhibit "B".

8. This First Dispute Letter specifically stated that Talesha Wright "denie[d] owing Midland Credit Management, Inc. any amount of money" and informed Midland Credit Management that Talesha Wright disputed any and all "Debts" Midland Credit Management claimed to possess. See Exhibit "B".

9. "Debts" as defined within the First Dispute Letter delineated and included "any related debt(s) and/or credit account(s) your company [Midland Credit Management] claims to have, sold, purchased and/or assigned from yourself, another creditor, debt buyer or other entity as of the date of this letter. See Exhibit "B".

10. Within the First Dispute Letter, The Law Firm of Fenters Ward demanded "proof of liability, accounting and ownership of these alleged accounts. The proof shall include any agreements and amendments thereto, any other written or signed documents agreed to by my

client, as well as a complete history of billing statements reflecting how you calculated the current amount claimed, owed, reported to the collection and/or credit agencies and complete copies of any assignment documentation evidencing your ownership rights to the specific accounts.” See Exhibit “B”.

11. Following the First Dispute Letter, Midland Credit Management possessed a duty to reflect the disputed nature of any and all tradelines associated with Talesha Wright and to communicate said disputed nature to any and all credit reporting agencies.

12. Furthermore, Midland Credit Management was directed to cease and desist from contacting Talesha Wright directly. See Exhibit “B”.

13. On December 30, 2020, The Law Firm of Fenters Ward filed an Entry of Appearance and an Intent to Defend on Talesha Wright’s behalf. True and correct copies of the Entry of Appearance and Notice of Intent to Defend are attached hereto, made a part hereof, and marked as Exhibit “C”.

14. On June 15, 2021, a Civil Action Hearing was held before the Honorable Jeffrey L. Herbst, Magisterial District Judge. See Exhibit “A”.

15. On June 15, 2021, at the conclusion of the Civil Action hearing, Judge Jeffrey L. Herbst granted a JUDGMENT FOR DEFENDANT in favor of Talesha Wright and against Midland Credit Management. A true and correct copy of the Notice of Judgment is attached hereto, made a part hereof, and marked as Exhibit “D”.

16. On July 15, 2021, Midland Credit Management’s appeal period expired, making Judge Jeffrey L. Herbst’s JUDGMENT FOR DEFENDANT a final judgment: rendering the alleged debt extinguished, invalid, and unenforceable.

17. On May 4, 2021, Midland Credit Management caused false and inaccurate information about Talesha Wright to be furnished to TransUnion as Midland Credit Management “updated” the tradeline associated with the alleged debt. A true and correct copy of the tradeline is attached hereto, made a part hereof, and marked as Exhibit “E”.

18. Midland Credit Management reported the abovementioned tradeline as “Remarks: >PLACED FOR COLLECTION<” and “Pay Status: >In Collection<”. See Exhibit “E”.

19. Therefore, Midland Credit Management falsely represented the character and legal status of the alleged debt in violation of 15 U.S.C. § 1692e(2)(a) of the FDCPA.

20. Upon falsely and inaccurately representing the character and legal status of the alleged debt, Midland Credit Management communicated credit information which is known or which should be known to be false in violation of 15 U.S.C. § 1692e(8) of the FDCPA.

21. Furthermore, Midland Credit Management failed to report the disputed nature of the tradeline associated with the alleged debt in violation of 15 U.S.C. § 1692e(8) of the FDCPA. See Exhibit “E”.

22. This purported the alleged debt to be enforceable and thereby constituted information that is known or should be known to be false in violation of 15 U.S.C. § 1692e(8) of the FDCPA.

COUNT I
VIOLATIONS OF THE FDCPA, 15 U.S.C. § 1692, *et seq.*

23. Plaintiff incorporates the allegations contained in the paragraphs, above, as if fully set forth at length herein.

24. There is abundant evidence of the use of abusive, deceptive, and unfair debt collection practices by many debt collectors. Abusive debt collection practices contribute to the

number of personal bankruptcies, to marital instability, to the loss of jobs, and to invasions of individual privacy. 15 U.S.C. 1692(a).

25. The purpose of the FDCPA is to “eliminate abusive debt collection practices by debt collectors, to ensure that those debt collectors who refrain from using abusive debt collection practices are not competitively disadvantaged, and to promote consistent State action to protect consumers against debt collection abuses.” 15 U.S.C. § 1692(e).

26. Talesha Wright is a “consumer” as defined by § 1692a(3) of the FDCPA.

27. Midland Credit Management is a “debt collector” as defined by § 1692a(6) of the FDCPA.

28. Upon information and belief, the alleged “debt” arises out of an alleged transaction entered into primarily for personal, family, or household purposes. “The term ‘debt’ means any obligation or alleged obligation of a consumer to pay money arising out of a transaction in which the money, property, insurance, or services which are the subject of the transaction are primarily for personal, family, or household purposes, whether or not such obligation has been reduced to judgment.” 15 U.S.C. § 1692a(5).

29. The Third Circuit has held that the FDCPA is to be enforced by private attorney generals. *Weiss v. Regal Collections*, 385 F.3d 337, 345 (3d. Cir. 2004).

30. Section 1692e of the FDCPA provides:

A debt collector may not use any false, deceptive, or misleading representation or means in connection with the collection of any debt. Without limiting the general application of the foregoing, the following conduct is a violation of this section: (2) The false representation of – (A) the character, amount, or legal status of any debt; (8) Communicating or threatening to communicate to any person credit information which is known or which should be known to be false, including the failure to communicate that a disputed debt is disputed.

15 U.S.C. § 1692e of the FDCPA.

31. On May 4, 2021, Midland Credit Management furnished information regarding the alleged debt to TransUnion.

32. Midland Credit Management reported that the tradeline associated with the alleged debt was "Remarks: >PLACED FOR COLLECTION<" and "Pay Status: >In Collection<." See Exhibit "E".

33. In the abovementioned report, Midland Credit Management failed to report the disputed nature of the tradeline associated with the alleged debt in violation of 15 U.S.C. § 1692e(8) of the FDCPA. See Exhibit "E".

34. Therefore, Midland Credit Management falsely represented the character and legal status of an alleged debt in violation of 15 U.S.C. § 1692e(2)(a) of the FDCPA and communicated credit information which is known or which should be known to be false in violation of 15 U.S.C. § 1692e(8) of the FDCPA.

35. Section 1692d of the FDCPA provides, in relevant part: "A debt collector may not engage in any conduct the natural consequence of which is to harass, oppress, or abuse any person in connection with the collection of a debt."

36. Here, the only natural consequence of Midland Credit Management's acts of willfully communicating credit information which was known to be false was to harass, oppress, and abuse Talesha Wright.

37. As such, Midland Credit Management's conduct, as set forth above, violated 15 U.S.C. § 1692d of the FDCPA.

38. Section 1692k(a) of the FDCPA provides, in relevant part:

...any debt collector who fails to comply with any provision of this subchapter with respect to any person is liable to such person in an

amount equal to the sum of – (1) any actual damages sustained by such person as the result of such failure; (2)(A) in the case of any action by an individual, such additional damages as the court may allow, but not exceeding \$1,000; and (3) in the case of any successful action to enforce the foregoing liability, the costs of the action, together with a reasonable attorney's fee as determined by the court.”

15 U.S.C. § 1692k(a) of the FDCPA.

39. As a direct and proximate result of Midland Credit Management’s violations of the FDCPA, as set forth above, Talesha Wright has suffered annoyance, anxiety, embarrassment, emotional distress, and severe inconvenience.

WHEREFORE, Plaintiff, Talesha Wright, respectfully requests that this Honorable Court enter judgment in their favor and against Defendant, Midland Credit Management, Inc., and enter an award of monetary damages as described herein, not in excess of arbitration limits, including an award for actual damages, statutory damages pursuant to 15 U.S.C. §1692k(a), costs and attorney’s fees pursuant to 15 U.S.C. § 1692k(a), and such other and further relief as this Honorable Court deems just and proper.

JURY TRIAL DEMANDED UPON APPEAL OR REMOVAL.

Respectfully submitted,

J.P. WARD & ASSOCIATES, LLC

Date: December 14, 2021

By: 

Joshua P. Ward (Pa. I.D. No. 320347)

Travis A. Gordon (Pa. I.D. No. 328314)

J.P. Ward & Associates, LLC
The Rubicon Building
201 South Highland Avenue
Suite 201
Pittsburgh, PA 15206

Counsel for Plaintiff

VERIFICATION

I, JOSHUA P. WARD, ESQ., have read the foregoing COMPLAINT and verify that the statements therein are correct to the best of my personal knowledge, information, and/or belief. I have gained this information from discussions with Plaintiff. This verification is made on behalf of Plaintiff. Plaintiff will produce their verification if/when there is an objection by Defendant or upon directive from the court.

I understand that this verification is made subject to the penalties of 18 Pa. C.S.A. 4904 relating to unsworn falsification to authorities, which provides that if I knowingly make false averments, I may be subject to criminal penalties.

Respectfully submitted,

J.P. WARD & ASSOCIATES, LLC

Date: December 14, 2021

By: 

Joshua P. Ward (Pa. I.D. No. 320347)

Travis A. Gordon (Pa. I.D. No. 328314)

J.P. Ward & Associates, LLC
The Rubicon Building
201 South Highland Avenue
Suite 201
Pittsburgh, PA 15206

Counsel for Plaintiff

EXHIBIT A

Magisterial District Judge 05-2-07**DOCKET**

Docket Number: MJ-05207-CV-0000309-2020

Civil Docket

Midland Credit Management, Inc.
v.
Talesha Wright

Page 1 of 2

CASE INFORMATION

<u>Judge Assigned:</u>	Magisterial District Judge Jeffrey L. Herbst	<u>File Date:</u>	12/14/2020
<u>Claim Amount:</u>	\$2,644.44	<u>Case Status:</u>	Closed
<u>Judgment Amount:</u>		<u>County:</u>	Allegheny

CALENDAR EVENTS

<u>Case Calendar</u>	<u>Schedule</u>			<u>Judge Name</u>	<u>Schedule</u>
<u>Event Type</u>	<u>Start Date</u>	<u>Start Time</u>	<u>Room</u>		<u>Status</u>
Civil Action Hearing	01/26/2021	9:00 am		Magisterial District Judge Jeffrey L. Herbst	Continued
Civil Action Hearing	02/02/2021	1:30 pm		Magisterial District Judge Jeffrey L. Herbst	Continued
Civil Action Hearing	03/09/2021	1:15 pm		Magisterial District Judge Jeffrey L. Herbst	Continued
Civil Action Hearing	04/27/2021	1:15 pm		Magisterial District Judge Jeffrey L. Herbst	Continued
Civil Action Hearing	06/15/2021	1:30 pm		Magisterial District Judge Jeffrey L. Herbst	Scheduled

CASE PARTICIPANTS

<u>Participant Type</u>	<u>Participant Name</u>	<u>Address</u>
Defendant	Wright, Talesha	Monroeville, PA 15146
Plaintiff	Midland Credit Management, Inc.	Philadelphia, PA 19113

DISPOSITION SUMMARY

<u>Docket Number</u>	<u>Plaintiff</u>	<u>Defendant</u>	<u>Disposition</u>	<u>Disposition Date</u>
MJ-05207-CV-0000309-2020	Midland Credit Management, Inc.	Talesha Wright	Judgment for Defendant	06/15/2021

Magisterial District Judge 05-2-07**DOCKET**

Docket Number: MJ-05207-CV-0000309-2020

Civil Docket

Midland Credit Management, Inc.

v.

Talesha Wright

Page 2 of 2

ATTORNEY INFORMATION**Private**Name: Travis Andrew Gordon, Esq.Representing: Wright, TaleshaCounsel Status: Active - Entry of AppearanceSupreme Court No.: 328314Phone No.: 412-545-3016

Address: Law Firm Of Fenters Ward
201 S Highland Ave Suite 201
Pittsburgh, PA 15206

Entry of Appearance Filed Dt: 12/30/2020Withdrawal of Entry of Appearance Filed Dt:**Private**Name: Daniel Joseph Santucci, Esq.Representing: Midland Credit Management, Inc.Counsel Status: Active - Entry of AppearanceSupreme Court No.: 092800Phone No.: 866-300-8750

Address: Midland Credit Management
1 International Plz Fl 5
Philadelphia, PA 19113-1510

Entry of Appearance Filed Dt: 12/14/2020Withdrawal of Entry of Appearance Filed Dt:**DOCKET ENTRY INFORMATION**

<u>Filed Date</u>	<u>Entry</u>	<u>Filer</u>	<u>Applies To</u>
06/15/2021	Judgment for Defendant	Magisterial District Court 05-2-07	Talesha Wright, Defendant
12/30/2020	Intent to Defend Filed	Talesha Wright	Talesha Wright, Defendant
12/30/2020	Entry of Appearance Filed	Travis Andrew Gordon, Esq.	Talesha Wright, Defendant
12/18/2020	Certified Civil Complaint Accepted	Magisterial District Court 05-2-07	Talesha Wright, Defendant
12/18/2020	Certified Civil Action Hearing Notice Accepted	Magisterial District Court 05-2-07	Talesha Wright, Defendant
12/15/2020	Certified Civil Action Hearing Notice Issued	Magisterial District Court 05-2-07	Talesha Wright, Defendant
12/15/2020	Certified Civil Complaint Issued	Magisterial District Court 05-2-07	Talesha Wright, Defendant
12/14/2020	Entry of Appearance Filed	Daniel Joseph Santucci, Esq.	Midland Credit Management, Inc., Plaintiff
12/14/2020	Civil Complaint Filed	Midland Credit Management, Inc.	

EXHIBIT B



THE LAW FIRM OF
FENTERS WARD
A I M T O W I N

201 SOUTH HIGHLAND AVE., SUITE 201
PITTSBURGH, PA 15206

JOSHUA WARD, ESQ.

MANAGING PARTNER

412-545-3016 OFFICE
412-540-3399 FAX

December 30, 2020

Midland Credit Management, Inc.
c/o Daniel Joseph Santucci, Esq.
Midland Credit Management, INC.
1 International Plaza 5th Floor
Philadelphia, PA 19113-1510

SENT VIA U.S. MAIL

Re: Our Client: Talehsa Wright
Docket Number: MJ-05207-CV-0000309-2020
Account Number(s):xxx

To Whom It May Concern:

Please accept this letter as confirmation of my representation of **Talehsa Wright** with a current address of **600 Greenleaf Drive, Monroeville, PA 15146**. My representation of the above-mentioned client includes any related debt(s) and/or credit account(s) your company claims to have, sold, purchased and/or assigned from yourself, another creditor, debt buyer or other entity as of the date of this letter (the "Debts"). Please cease and desist any further communications with my client as it relates to the collection of Debts.

According to my client, your company has been reporting the above-referenced accounts to collection and/or credit agencies. My client denies owing **MIDLAND CREDIT MANAGEMENT, INC** any amount of money and demands proof of liability, accounting and ownership of these alleged accounts. The proof shall include any agreements and any amendments thereto, any other written or signed documents agreed to by my client, as well as, a complete history of billing statements reflecting how you calculated the current amount claimed, owed, reported to the collection and/or credit agencies and complete copies of any assignment documentation evidencing your ownership rights to the specific accounts.

Pursuant to the Consumer Financial Protection Act (**CFPA**) 12 U.S.C. 5533(a) and the Fair Debt Collection Practices Act (**FDCPA**) 15 U.S.C. § 1692 et seq. we request that you provide additional documents related to the Debt you claim is owed by our client:

1. the original account-level documentation reflecting all purchases, payments, or other actual uses of the account;
2. a document signed by our client evidencing the opening of the account forming the basis for the debt;
3. the name of the creditor at the time of charge-off, including the name under which the creditor did business with our client;



THE LAW FIRM OF
FENTERS WARD
A I M T O W I N

201 SOUTH HIGHLAND AVE., SUITE 201
PITTSBURGH, PA 15206

JOSHUA WARD, ESQ.

MANAGING PARTNER

412-545-3016 OFFICE
412-540-3399 FAX

4. the last four digits of the account number associated with the debt at the time our client's last monthly account statement, or, if not available, at the time of charge-off; the charge-off balance;
5. MIDLAND CREDIT MANAGEMENT, INC's method of calculating any amount claimed in excess of the charge-off balance;
6. a copy of the statement where MIDLAND CREDIT MANAGEMENT, INC offered to provide our client (within 30 days of a written request) with copies of a document signed by our client evidencing the opening of the account forming the basis for the debt; and the original account-level documentation reflecting a purchase, payment, or other actual use of the account.

Please be advised that at all times relative hereto, we are disputing this debt under the FDCPA, FCRA, FCEUA and/or the UTPCPL. **AS SUCH YOU MUST 1) NOTIFY ANY CRAs YOU HAVE FURNISHED INFORMATION TO THAT THIS TRADE LINE IS DISPUTED; 2) YOU MUST CEASE ALL COLLECTION ATTEMPTS AND DELETE THE TRADE LINE UPON FINAL DISMISSAL OF THE DEBT COLLECTION LAWSUIT IF JUDGMENT IS RENDERED IN FAVOR OF DEFENDANT.** You may direct the requested proof to my office at the address listed above. **YOU HAVE THIRTY (30) DAYS TO PROVIDE THE REQUESTED PROOFS.** All future correspondence or contact shall be directed to my office until my office provides written confirmation of termination of legal representation, if such termination should ever occur. **YOU MUST PROVIDE THIS NOTICE TO ANY ASSIGNEE, TRANSFEREE OR SUBSEQUENT OWNER OF THIS OR ANY DEBT. IF YOU FAIL IN ANY OF THESE REGARDS, YOU WILL BE SUBJECT TO LIABILITY UNDER FEDERAL AND STATE CONSUMER PROTECTION LAWS.**

Very truly yours,

/s/ Travis Gordon

Travis A. Gordon, Esq.
tgordon@fentersward.com
PA Bar I.D.: 328314

TAG/tmn
Cc: Talehsa Wright

EXHIBIT C

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF Allegheny



**ENTRY OF APPEARANCE
PURSUANT TO PARCPMDJ
207.1(A)**

Mag. Dist. No: 05-2-07
MDJ Name: Honorable Jeffrey L. Herbst
Address: 339 Old Haymaker Road
Monroeville, PA
15146
Telephone: 412-372-1125

MIDLAND CREDIT
MANAGEMENT, INC

v.

TALESHA WRIGHT

Docket No: MJ-05207-CV-0000309-2020
Case Filed:

TO THE MAGISTERIAL DISTRICT COURT:

Please enter my appearance on behalf of Defendant TALESHA WRIGHT
In the above captioned matter.

Attorney Name: Travis A. Gordon

Supreme Court of Pennsylvania Attorney Identification Number: 328314

Firm Name: The Law Firm of Fenters Ward

Address: 201 South Highland Avenue, Suite 201

City, State, Zip Code: Pittsburgh, Pennsylvania 15206

I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently than non-confidential information and documents.

/s/ Travis A. Gordon
Signature of Applicant

December 30, 2020
Date



THE LAW FIRM OF
FENTERS WARD
AIM TO WIN

201 SOUTH HIGHLAND AVE., SUITE 201
PITTSBURGH, PA 15206

JOSHUA WARD, ESQ.

MANAGING PARTNER

~~412-545-3016~~ OFFICE
412-540-3399 FAX

December 30, 2020

Magisterial District 05-2-07
Honorable Jeffrey L. Herbst
339 Old Haymaker Road
Monroeville, PA 15146
Phone: 412-372-1125
Sent via fax: 412-372-8740

RE: MJ-05207-CV-0000309-2020. MIDLAND CREDIT MANAGEMENT, INC vs. TALESHA WRIGHT

INTENT TO DEFEND NOTICE:

DEFENDANT INTENDS TO ENTER A DEFENSE. PLEASE CONSIDER THIS NOTICE PER Pa. R. Civ. P. MAG DIST J RULE 305(4)(a).

PLEASE NOTIFY PLAINTIFF THAT DEFENDANT HAS ENTERED NOTICE TO DEFEND PER Pa. R. Civ. P. MAG DIST J RULE 318.

ALSO, PLEASE UPDATE THE DOCKET TO SHOW THAT DEFENDANT INTENDS TO DEFEND AS WELL AS OUR ENTRY OF APPEARANCE.

Very truly yours,

/s/ Travis Gordon

Travis A. Gordon, Esq.
tgordon@fentersward.com
PA Bar I.D.: 328314

TAG/tmn

Cc: Daniel Joseph Santucci, Esq.
Talehsa Wright

EXHIBIT D

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF ALLEGHENY



**NOTICE OF JUDGMENT/TRANSCRIPT
CIVIL CASE**

Mag. Dist. No: MDJ-05-2-07
MDJ Name: Honorable Jeffrey L. Herbst
Address: 339 Old Haymaker Road
Suite 1500
Monroeville, PA 15146
Telephone: 412-372-1125

Midland Credit Management, Inc.
v.
Talesha Wright

Travis Andrew Gordon, Esq.
Law Firm Of Fenters Ward
201 S Highland Ave Suite 201
Pittsburgh, PA 15206

Docket No: MJ-05207-CV-0000309-2020
Case Filed: 12/14/2020

Disposition Details

Disposition Summary (cc - Cross Complaint)

<u>Docket No</u>	<u>Plaintiff</u>	<u>Defendant</u>	<u>Disposition</u>	<u>Disposition Date</u>
MJ-05207-CV-0000309-2020	Midland Credit Management, Inc.	Talesha Wright	Judgment for Defendant	06/15/2021

Comments:

ANY PARTY HAS THE RIGHT TO APPEAL WITHIN 30 DAYS AFTER THE ENTRY OF JUDGMENT BY FILING A NOTICE OF APPEAL WITH THE PROTHONOTARY/CLERK OF COURT OF COMMON PLEAS, CIVIL DIVISION. YOU MUST INCLUDE A COPY OF THIS NOTICE OF JUDGMENT/TRANSCRIPT FORM WITH YOUR NOTICE OF APPEAL.

EXCEPT AS OTHERWISE PROVIDED IN THE RULES OF CIVIL PROCEDURE FOR MAGISTERIAL DISTRICT JUDGES, IF THE JUDGMENT HOLDER ELECTS TO ENTER THE JUDGMENT IN THE COURT OF COMMON PLEAS OR THE PHILADELPHIA MUNICIPAL COURT, ALL FURTHER PROCESS MUST COME FROM THE COURT OF COMMON PLEAS OR THE PHILADELPHIA MUNICIPAL COURT AND NO FURTHER PROCESS MAY BE ISSUED BY THE MAGISTERIAL DISTRICT JUDGE.

UNLESS THE JUDGMENT IS ENTERED IN THE COURT OF COMMON PLEAS OR THE PHILADELPHIA MUNICIPAL COURT, ANYONE INTERESTED IN THE JUDGMENT MAY FILE A REQUEST FOR ENTRY OF SATISFACTION WITH THE MAGISTERIAL DISTRICT JUDGE IF THE JUDGMENT DEBTOR PAYS IN FULL, SETTLES, OR OTHERWISE COMPLIES WITH THE JUDGMENT.

JUN 15 2021

Date

Magisterial District Judge Jeffrey L. Herbst



I certify that this is a true and correct copy of the record of the proceedings containing the judgment.

Date

Magisterial District Judge

RECEIVED
BY: JUN 17 2021

SCANNED
BY: 17 JUN 2021



Midland Credit Management, Inc.
v.
Talesha Wright

Docket No.: MJ-05207-CV-0000309-2020

Participant List

Private(s)

Travis Andrew Gordon, Esq.
Law Firm Of Fenters Ward
201 S Highland Ave Suite 201
Pittsburgh, PA 15206

Daniel Joseph Santucci, Esq.
Midland Credit Management
1 International Plz Fl 5
Philadelphia, PA 19113-1510

Plaintiff(s)

Midland Credit Management, Inc.
1 International Plaza, 5th Floor
Philadelphia, PA 19113

Defendant(s)

Talesha Wright
600 Greenleaf Dr
Monroeville, PA 15146



**CONFIDENTIAL
DOCUMENT FORM**

Case Records Public Access Policy of the Unified Judicial System of Pennsylvania

204 Pa. Code § 213.81

www.pacourts.us/public-records

TALESHA WRIGHT

(Party name as displayed in case caption)

AR-21-

Docket/Case No.

Vs.

MIDLAND CREDIT MANAGEMENT, INC.

(Party name as displayed in case caption)

Common Pleas Allegheny

Court

This form is associated with the pleading titled COMPLAINT, dated December 14, 2021.

Pursuant to the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania*, the Confidential Document Form shall accompany a filing where a confidential document is required by law, ordered by the court, or is otherwise necessary to effect the disposition of a matter. This form shall be accessible to the public, however the documents attached shall not be publicly accessible, except as ordered by a court. The documents attached will be available to the parties, counsel of record, the court, and the custodian.

Please only attach documents necessary for the purposes of this case. Complete the entire form and check all that apply. This form and any additional pages must be served on all unrepresented parties and counsel of record.

Type of Confidential Document	Paragraph, page, etc. where the confidential document is referenced in the filing:
<input checked="" type="checkbox"/> Financial Source Documents	
<input type="checkbox"/> Tax Returns and schedules	
<input type="checkbox"/> W-2 forms and schedules including 1099 forms or similar documents	
<input type="checkbox"/> Wage stubs, earning statements, or other similar documents	
<input checked="" type="checkbox"/> Credit card statements	Exhibit E
<input checked="" type="checkbox"/> Financial institution statements (e.g., investment/bank statements)	Exhibit E
<input type="checkbox"/> Check registers	
<input type="checkbox"/> Checks or equivalent	
<input type="checkbox"/> Loan application documents	
<input type="checkbox"/> Minors' educational records	
<input type="checkbox"/> Medical/Psychological records	
<input type="checkbox"/> Children and Youth Services' records	
<input type="checkbox"/> Marital Property Inventory and Pre-Trial Statement as provided in Pa.R.C.P. No. 1920.33	
<input type="checkbox"/> Income and Expense Statement as provided in Pa.R.C.P. No. 1910.27(c)	
<input type="checkbox"/> Agreements between the parties as used in 23 Pa.C.S. §3105	

I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

/s/ Joshua P. Ward

Signature of Attorney or Unrepresented Party

12/14/21

Date

Name: Joshua P. Ward

Attorney Number: (if applicable) 320347

Address: 201 South Highland Avenue, Suite 201

Telephone: (412) 545-3015

Pittsburgh, PA 15206

Email: jward@jpward.com

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

TALESHA WRIGHT,

Plaintiff,

vs.

MIDLAND CREDIT MANAGEMENT, INC.,

Defendant.

CIVIL DIVISION

ELECTRONICALLY FILED

Case No. AR-21-_____

**CONFIDENTIAL EXHIBIT TO
COMPLAINT IN CIVIL ACTION
EXHIBIT E**

Filed on Behalf of Plaintiff:
Talesha Wright

Counsel of Record for this Party:
J.P. WARD & ASSOCIATES, LLC

Joshua P. Ward
Pa. I.D. No. 320347

J.P. Ward & Associates, LLC
The Rubicon Building
201 South Highland Avenue
Suite 201
Pittsburgh, PA 15206

Telephone: (412) 545-3015
Fax No.: (412) 540-3399
E-mail: jward@jpward.com

EXHIBIT E

USPS CERTIFIED MAIL



9214 8901 9403 8361 7560 99

3588.2



quadiant

FIRST-CLASS MAIL

\$007.76⁹

12/20/2021 ZIP 15206
043M31217099

US POSTAGE

First Class Mail
First Class Mail

RECEIVED
DEC 28 2021
BY: _____



201 SOUTH HIGHLAND AVE, SUITE 201. PITTSBURGH, PA 15206



Midland Credit Management, Inc.
350 Camino De La Reina
San Diego, CA 92108